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POSTAL RATE COMMISCION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

THE DIRECT MARKETING ASSOCIATION, INC.'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED TO USPS WITNESS DEGEN (DMA/USPS-T12-1)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached first set of interrogatories and requests for production of documents to USPS witness Degen (DMA/USPS-T12-1). If the designated witness is unable to respond to this interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

Dana T. Ackerly II, Esq.

David L. Meyer

Michael D. Bergman COVINGTON & BURLING

1201 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

(202) 662-5296

Counsel for the Direct Marketing Association, Inc.

August 27, 1997

Witness Degen (USPS-T-12)

DMA/USPS-T12-1. For each FY 1996 clerks and mailhandlers (C/S 3) IOCS tally, please provide the following information in a machine-readable format: (1) the date and day of week of actual reading, (2) actual reading time, (3) MODS work center number, (4) dollar amount assigned by tally, (5) activity code, (6) responses to questions 18 and 19 in CODES, and (7) basic function.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 (section 3001.12) of the Postal Rate Commission's Rules of Practice and Procedure and Rule 3 of the Commission's Special Rules of Practice in this proceeding.

Michael D. Bergman

August 27, 1997

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BY HAND

Docket Section Postal Rate Commission 1333 H Street, N.W. Suite 300 Washington, D.C. 20268

> R97-1 Re:

Dear Sir/Madam:

Pursuant to the alternative procedure for filing set forth in Special Rule of Practice 3, please accept for filing in the above-referenced docket the enclosed original and three copies each of:

> The Direct Marketing Association, Inc.'s ("DMA's") Fourth Set of Interrogatories and Requests for Production of Documents Directed to USPS Witness Bradley (DMA/USPS-T14-32); and

August 27, 1997

DMA's First Set of Interrogatories and Requests 2. for Production of Documents Directed to USPS Witness Degen (DMA/USPS-T12-1).

A disk containing these documents in WordPerfect 5.1 format, Arial 12 font, is also enclosed.

Please date-stamp the enclosed extra copies of these documents and return it with our waiting messenger.

Thank you very much.

Sincerely,

Michael D. Bergman

Mica D'Buguan

Enclosures